

## LIST OF EXHIBITS

### KEY EXHIBITS

1. 2012/04/13, Consumer Financial Protection Bureau Re: Service Providers (3 pgs.)
2. 2012/04/04, Illinois Supreme Court Mortgage Foreclosure Committee Proposals (2 pgs.)
3. 2012/04/04, Affidavit 1 (3 pgs.)
4. 2012/04/04, Affidavit 2 (4 pgs.)
5. 2010/09/01, Affidavit in Case 09CH03797 (2 pgs.)
6. 2011/01/20, Affidavit in Case 09CH03797 (2 pgs.)
7. 2012/04/10, E-mail to Thomas P. James, Consumer Counsel, Consumer Fraud Bureau, Illinois Attorney General re: ILLINOIS SUPREME COURT SEEKING COMMENTS ON PROPOSALS TO IMPROVE FORECLOSURE PROCEEDINGS, April 4, 2012, including March 23, 2011 e-mail re: **SCHEFFERS/ILSC TREASONOUS \*DENIAL\* OF Motion to Vacate Void Orders Pursuant to Section 2-619** (6 pgs.)
8. 2011/01/07, Massachusetts Supreme Judicial Court, U.S. Bank National Associates, trustee [FN1] vs. Antonio IBANEZ (16 pgs.)
9. 2008/05/21, Appellate Court of Illinois, Fifth District, No. 5-06-0664, Bayview Loan Servicing, L.L.C. v. Jeffrey Eden Nelson (6 pgs.)
  - a. A summary judgment is an appropriate remedy only if the pleadings, depositions, and admissions on file, together with any affidavits, show that there is no genuine issue of material fact and that the movant is entitled to a judgment as a matter of law. *Puertill v. Hess*, 111 Ill.2d 229, 240 (1986) (pg. 4).
  - b. **Nothing in the trial court record indicates that Bayview holds the mortgage or note that is the subject of this foreclosure action. (final pg.)**
  - c. **Additionally, because there was no basis for the entry of a summary judgment in favor of Bayview, the court improperly entered the judgment of foreclosure and order of sale. (final pg.)**
10. 2012/04/06, Appellate Court of Illinois, Fifth District, No. 5-10-0483 (3 pgs.)
11. 2012/12/23, Chief Justice Kilbride of the Supreme Court of Illinois correction of order per Motion to Correct submitted by non-attorney (2 pgs.)
12. 2012/04/05, 12<sup>th</sup> Judicial Circuit Court Online Docket, Judicial Notice requested (10 pgs.)
13. 2009/09/16, Pierce & Associates Collection Letter (2 pgs.)
  - a. Hired by American Home Mortgage Servicing, Inc., the servicer, not by the Plaintiff
  - b. The total amount of the debt due is \$186,795.82 vs. \$170,963.25 in the Complaint
14. 2010/02/26, Plaintiff's Response to Defendant's First Request for Production (6 pgs.)
15. 2010/08/12, Order (1 pg.)
  - a. **"All filings by Defendant Scheffers related to affirmative defenses, counterclaims, or related defense matters must be submitted to the Court for written approval regarding whether Plaintiff must respond or whether the filings will be stricken without hearing or further briefings."**

**KEY EXHIBITS (CON'T.)**

16. 2010/11/16, Report of Proceedings, presiding Judge Siegel (11 pgs.)
17. 2011/07/01, Notice of Appeal (1 pg.)
18. 2011/07/20, Sheriff's Report of Sale and Distribution (2 pgs.)
19. Foundational Illinois legislation, Supreme Court Rules, Civil Statutes, and Judicial/Attorney Codes of Professional Conduct
  - a. Public Act 096-1551, AN ACT concerning criminal law, effective July 1, 2011 (3 pgs.)
  - b. Rule 63, Canon 3 (3 pgs.)
  - c. Rule 8.4, Misconduct (2 pgs.)
  - d. List of Exhibits – Motion to Vacate (3 pgs.)
    - 1) ILCS 735.5/109, Code of Civil Procedure, re: Verification by Certification
    - 2) ILCS 735.5/Art. II. Pt. 10, Code of Civil Procedure, re: Summary Judgment
    - 3) ILCS 765-5/0.01, Illinois Conveyances Act
    - 4) ILCS 735.5/Art. XV, Illinois Mortgage Foreclosure Law
    - 5) ILCS 810.5/Article 3, Uniform Commercial Code, re: Negotiable Securities and Part 3. Enforcement of Instruments
    - 6) ILCS 735.5/Art. II, Pt. 6 Code of Civil Procedure, re: Pleading
  - e. Illinois Financial Crime Law (4 pgs.)
20. 2010, "Do – Did", by James McGuire (1 pg.)
21. ~~2009/01/15 Assignment of Mortgage/Deed (1 pg.)~~  
**NOTE: Alleged assignment was notarized after the Note was in default with an effective date after the Note was included in a Chapter 7 Bankruptcy filing on January 30, 2009**
22. **2008/11/20 Alleged corporate resolution by Citi Residential Lending Inc.** regarding signing authority for **assignments** by Crystal Moore and Bryan Bly, both employees of Nationwide Title Clearing, Inc., not of Citi Residential Lending (3 pgs.)
  - a. Bryan Bly
  - b. Crystal Moore
  - c. Only 2 of 3 signatures
  - d. No titles of signatories

**NOTE: Where did Town & Country Credit authorize Citi Residential Lending Inc. to have legal standing to assign the Note and the Mortgage**

23. 07/09/10 Santa Claus Assignment as fabricated/published on the Internet (1 pg.)
24. 2010/10/25 Deutsche Bank Re: Certain Allegations Regarding Loan Servicer Foreclosure Practices (1 pg.)
  - a. "Specifically, the Trustee issued, on October 8, 2010, the attached memorandum to all loan servicers for **U.S. residential mortgage backed securities trusts**"

**NOTE: The alleged trust is not a land trust as specified in Sec. 15-1106 of the Illinois Mortgage Foreclosure Law**

**KEY EXHIBITS (CON'T.)**

25. 2010/10/08, Deutsche Bank Re: Allegations Regarding Certain Servicing Foreclosure Procedures (3 pgs.)

- a. "We write to express the Trustee's serious concern regarding allegations of potential defects in foreclosure practices, procedures and/or documentation used by certain major loan servicers and their agents" (pg. 1)
- b. **"Cease and desist from taking any unlawful or improper action with respect to the servicing of Trust assets, including, but not limited to, making any false or misleading statements in any filing, notice, document or paper of any kind" (pg. 2)**
- c. **"Cease and desist from executing any document on behalf of the Trustee or on behalf of any Trust, under any power or attorney or otherwise, unless and until the Servicer and its agents have: (a) verified that all statements in such document are true, complete and correct; and (b) determined that the execution and filing of such documents are in full compliance with all applicable laws, rules and regulations, including all applicable rules of court" (pg. 2)**

**NOTE: The January 10, 2011 Affidavit of Prove-Up document violates this Cease and Desist order with its violation of the Chapter 7 Bankruptcy filing on January 30, 2009**

**NOTE: The affiant apparently had no personal knowledge of the Chapter 7 Bankruptcy**

- d. **"Cease and desist from executing any document in a manner that indicates or suggests that the signatory is an officer or employee of the Trustee" (pg. 2)**

**NOTE: The January 10, 2011 Affidavit of Prove-Up document violates this Cease and Desist order as "Agent" for the Trustee**

26. 2008/07/28 Deutsche Bank Re: Advisory Concerning Servicing Issues Affecting Securitized Housing Assets (4 pgs.)

**NOTE: The alleged trust is not a land trust as specified in Sec. 15-1106 of the Illinois Mortgage Foreclosure Law**

- a. **"(1) Foreclosure Procedures: Proof of "Ownership" of Loans (pg. 1)**
  - 1) "in compliance with all federal, state, and local laws, rules, regulations and court procedures"

**NOTE: The Illinois Conveyances Act controls the recording requirements relative to real estate liens**

- b. "In this regard, the Trustee is concerned that servicers make clear to their servicing personnel and other professionals, including legal counsel, retained by servicers, that securitization trusts typically become the owners of, and take title to, mortgage loans at the time the securitization trusts are formed (pg. 2)

**NOTE: The alleged Trust closed on February 6, 2004**

**KEY EXHIBITS (CON'T.)**

26. 2008/07/28 Deutsche Bank Re: Advisory Concerning Servicing Issues Affecting **Securitized Housing Assets** (con't.)

- c. "In particular, servicing professionals must become sufficiently familiar with the terms of the relevant securitization documents for each Trust for which they act to explain and, where necessary, prove those terms and the resulting ownership interests to courts and government agencies" (pg. 2)
- d. **"In no event should servicer-retained foreclosure professionals, including counsel, mislead third parties, including courts, into believing that the Trustee directly controls the foreclosure process or any related litigation process (pg. 2)**

**NOTE: The Complaint in this instant action lists the Trust as Plaintiff, not American Home Mortgage Servicing, Inc., as servicer on behalf of the Trust**

27. 2007/08/30 Deutsche Bank Re: Complaint With Laws, Rules and Regulations in Connection With Foreclosures on **Securitized Assets**: Attentiveness to Certain Community and Governmental Concerns: Proper Description of Legal Capacities (2 pgs.)

**NOTE: The alleged trust is not a land trust as specified in Sec. 15-1106 of the Illinois Mortgage Foreclosure Law**

- a. "d) At all times properly identify your representative capacity, as servicer, and DBNTC's or DBTCA's capacity "as Trustee of [insert name of relevant Trust]" in all notices, pleadings, correspondence or other documents relating to the mortgage loans" (pg. 2)

**NOTE: The Complaint in this instant action lists the Trust as Plaintiff, not American Home Mortgage Servicing, Inc., as servicer on behalf of the Trust**

**GROUP EXHIBIT 1 – FRAUD UPON THE COURT**

1. 2012/04/12, Judicial Inquiry Board
  - a. **Request for an Immediate Investigation of Judge Richard J. Siegel for Commission of a Class 1 Felony and for Multiple Violations of the Judicial Code of Conduct** (5 pgs.)
  - b. Judicial Complaint Form (4 pgs.)
  - c. List of Exhibits (3 pgs.)
  - d. 2012/04/13, USPS Signature-Required Proof of Delivery (1 pg.)
2. 2012/04/05, Copies of E-mails with print-outs of attached PDFs to Consumer Counsel, IAG, Re: **WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12**
  - a. Notice of Filing, April 5, 2012 (1 pg.)
  - b. Certification of Service (1 pg.)
  - c. 2012/04/04 Letter to Judge Richard J. Siegel with Signature-Required Confirmation of Delivery of 2307 1770 0000 1052 1604 (1 pg.)
  - d. 2012/04/04 List of Enclosures (2 pgs.)
  - e. 2012/03/02 E-mails to Thomas P. James, Consumer Counsel, Consumer Fraud Bureau, Illinois Attorney General
    - 1) Re: SCHEFFERS 1 of 6/WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12 (4 pgs.)
    - 2) Re: SCHEFFERS 2 of 6/WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12 (2 pgs.)
    - 3) Re: SCHEFFERS 3 of 6/WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12 (1 pg.)
    - 4) Re: SCHEFFERS 4 of 6/WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12 (4 pgs.)
    - 5) Re: SCHEFFERS 5 of 6/WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12 (4 pgs.)
    - 6) Re: SCHEFFERS 6 of 6/WILL COUNTY JUDGE SIEGEL COMMITTED CLASS 1 FELONY ON 02/29/12 (2 pgs.)
3. 2011/09/07, Report of Proceedings, presiding **Judge O'Leary's signature forged** by William McAlistier of Codilis & Associates (3 pgs.)
4. 2010/11/12, Motion for Sanctions
  - a. Notice of Motion, November 12, 2010 (1 pg.)
  - b. Proof of Service (2 pgs.)
  - c. Defendant Section 1109 Certification (1 pg.)
  - d. Defendant Motion for Sanctions (13 pgs.)
  - e. List of Exhibits (13 pgs.)
5. 2010/11/22, Recusal Order by Judge Siegel under Rule 63 (3 pgs.)
6. 2011/01/21, Response to Defendant's Motion for Sanctions <sic>
  - a. Notice of Filing/Proof of Service, January 21, 2011 (1 pg.)
  - b. Response to Defendant's Motion for Sanctions <sic> (2 pgs.)

**GROUP EXHIBIT 1 – FRAUD UPON THE COURT (CON'T.)**

7. 2011/02/07, Defendant Reply in Support of Defendant Motion for Sanctions
  - a. Notice of Filing, February 7, 2011 (1 pg.)
  - b. Proof of Service (2 pgs.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Reply in Support of Defendant Motion for Sanctions (11 pgs.)
  - e. List of Exhibits (10 pgs.)
8. 2011/05/08, Motion for Sanctions Against Pierce & Associates Pursuant to Rule 137
  - a. Notice of Motion, May 8, 2011 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Motion for Sanctions Against Pierce & Associates Pursuant to Rule 137 (5 pgs.)
  - e. List of Exhibits (4 pgs.)
9. **Pierce & Associates Response to Defendant's Motion for Sanctions Against Pierce & Associates Pursuant to Rule 137 - NONE**
10. 2011/06/22, Order (1 pg.)
  - a. **"Defendant's Motion for Sanctions Against Pierce & Associates is denied."**

**GROUP EXHIBIT 2 – IAG COMPLAINT 12CH03602 IN THE CIRCUIT COURT OF COOK COUNTY**

1. 2012/02/02, Complaint 12CH03602 in the Circuit Court of Cook County, Chancery Division
  - a. **The People of the State of Illinois, Plaintiff, v. Nationwide Title Clearing, Inc., a Florida corporation, Defendants**
  - b. Filed February 2, 2012
  - c. Complaint for Injunctive and Other Relief for violations of the Consumer Fraud and Deceptive Business Practices Act ("Consumer Fraud Act"), 815 ILCS 505/1 *et seq* (23 pgs.)
  - d. Exhibits (6 pgs.)
2. 2011/05/25, Subpoena Duces Tecum of the Attorney General of the State of Illinois, The People of the State of Illinois Consumer Protection Division
  - a. Subpoena Duces Tecum of the Attorney General of the State of Illinois (1 pg.)
  - b. Rider to Subpoena for Nationwide Title Clearing, Inc. with Interrogatories and Requests for Production (5 pgs.)
  - c. **Exhibit A, relative to ILSC Case 113313 (9 pgs.)**
  - d. **Exhibit B, relative to ILSC Case 113039 (2 pgs.)**
  - e. Certified Mail (1 pg.)



**ILLINOIS SUPREME COURT CASES 113313/113039**

**GROUP EXHIBIT 3 – CASE 113313, NOTICE OF FILING PETITION FOR LEAVE TO APPEAL PURSUANT TO RULE 315 OR APPEAL AS A MATTER OF RIGHT PURSUANT TO RULE 317**

1. 2011/11/02, Notice of Filing Petition for Leave to Appeal Pursuant to Rule 315 or Appeal as a Matter of Right Pursuant to Rule 317
  - a. Notice of Filing, November 2, 2011 (2 pgs.)
  - b. Proof of Service (2 pgs.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Notice of Filing Petition for Leave to Appeal Pursuant to Rule 315 or Appeal as a Matter of Right Pursuant to Rule 317 (19 pgs.)
  - e. Separate Appendix (8 pgs.)
2. 2012/01/25, "Notification Letter" (1 pg.)
  - a. "The Supreme Court today DENIED the petition for leave to appeal or appeal as a matter of right in the above entitled cause."

**GROUP EXHIBIT 4 – CASE 113313, MOTION FOR SERVICE OF ORDERS SIGNED BY SUPREME COURT AND APPELLATE COURT JUSTICES**

1. 2012/12/15, Motion for Service of Orders Signed by Supreme Court and Appellate Court Justices
  - a. Notice of Filing, December 15, 2012 (1 pg.)
  - b. Proof of Service (4 pgs.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Motion for Service of Orders Signed by Supreme Court and Appellate Court Justices (20 pgs.)
  - e. Separate Appendix (7 pgs.)
2. 2012/01/06, "Notification Letter" (1 pg.)
  - a. "Today the following order was entered in the captioned case: Motion by petitioner, pro se, for service of signed orders by Supreme Court and Appellate Court Justices, Motion Denied. Order entered by the court."

**GROUP EXHIBIT 5 – CASE 113313, MOTION TO VACATE VOID ORDERS DUE TO LACK OF JURISDICTION PURSUANT TO SECTION 2-619**

1. 2012/03/06, Motion to Vacate Void Orders due to Lack of Jurisdiction Pursuant to Section 2-619
  - a. Notice of Filing, March 6, 2012 (1 pg.)
  - b. Proof of Service (4 pgs.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Motion to Vacate Void Orders due to Lack of Jurisdiction Pursuant to Section 2-619 (16 pgs.)
  - e. Appendix (2 pgs.)
2. 2012/03/20, "Notification Letter" (1 pg.)
  - a. "Motion by petitioner, pro se, to Vacate void orders due to lack of jurisdiction Pursuant to Section 2-619. Motion denied."
3. 2012/03/26, E-mail to Consumer Counsel, IAG Re: **SCHEFFERS/ILSC TREASONOUS \*DENIAL\* OF Motion to Vacate Void Orders Pursuant to Section 2-619**
  - a. Notice of Filing, March 26, 2012 (1 pg.)
  - b. Certification of Service (1 pg.)
  - c. 2012/03/23, E-mails to Thomas P. James, Consumer Counsel, Consumer Fraud Bureau, Illinois Attorney General Re: SCHEFFERS/ILSC TREASONOUS \*DENIAL\* OF Motion to Vacate Void Orders Pursuant to Section 2-619 (3 pgs.)
  - d. 2012/03/20, "Notification Letter" (1 pg.)
    - 1) "Motion by petitioner, pro se, to vacate void orders due to lack of jurisdiction Pursuant to Section 2-619. Motion denied." (1 pg.)

**THIRD APPELLATE COURT CASE 3-11/0476**

**GROUP EXHIBIT 6 – PETITION FOR CERTIFICATE OF IMPORTANCE**

1. 2011/10/17, Petition for Certificate of Importance
  - a. Notice of Filing, October 17, 2011 (1 pg.)
  - b. Certification of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Petition for Certificate of Importance (13 pgs.)
2. 2011/11/10, "Notification Letter" (1 pg.)
  - a. "The Court has this day entered in the above entitled cause the following order: Appellant's Petition for Certificate of Importance is DENIED."



**12<sup>th</sup> JUDICIAL CIRCUIT COURT CASE 09CH3797**

**GROUP EXHIBIT 7 – ANSWER AND COUNTER-COMPLAINT**

1. 2009/11/13, Answer and Counter-Complaint
  - a. Defendant Section 1 109 Certification (1 pg.)
  - b. Answer and Counter-Complaint (20 pgs.)
  - c. Exhibit Categories (4 pgs.)

**GROUP EXHIBIT 8 – DEFENDANT'S MOTION FOR QUIET TITLE**

1. 2009/11/09, Defendant's Motion for Quiet Title
  - a. Notice of Motion, November 9, 2009 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant's Motion for Quiet Title (2 pgs.)
2. 2009/12/21, Response to Defendant's Motion for Quiet Title
  - a. Notice of Filing/Proof of Service, December 21, 2009 (1 pg.)
  - b. Response to Defendant's Motion for Quiet Title (3 pgs.)
3. 2010/01/14, Defendant/Counter-Plaintiff Reply to Plaintiff/Counter-Defendant Response to Motion for Quiet Title (15 pgs.)
  - a. Notice of Filing, January 14, 2010 (2 pgs.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant/Counter-Plaintiff Reply to Plaintiff/Counter-Defendant Response to Motion for Quiet Title (15 pgs.)
  - e. List of Exhibits (1 pg.)
4. 2009/11/24, Order with briefing schedule (1 pg.)
5. 2009/11/28, Order (1 pg.)
  - a. "Motion for Quiet Title denied."
  - b. "Plaintiff has 28 days to respond to Defendant's Counterclaim and Affirmative Defenses, as well as any pending discovery."

**GROUP EXHIBIT 9 – DEFENDANT MOTION TO COMPEL PRODUCTION**

1. 2009/12/24, Defendant's First Request for Production (3 pgs.)
2. 2010/02/26, Plaintiff's Response to Defendant's First Request for Production
  - a. Certification of Service, February 26, 2010 (1 pg.)
  - b. Plaintiff's Response to Defendant's First Request for Production (5 pgs.)
3. 2010/06/11, Defendant Motion to Compel Production
  - a. Notice of Motion – Amended Date, June 11, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Motion to Compel Production (4 pgs.)
  - e. List of Exhibits (1 pg.)
4. 2010/08/12, Order (1 pg.)
  - a. "Defendant's Motions denied for reasons stated on the record."

**NOTE: No such reason stated in the Report of Proceedings.**

**GROUP EXHIBIT 10 – PLAINTIFF/COUNTER-DEFENDANT’S MOTION TO DISMISS AFFIRMATIVE DEFENSES AND COUNTER- COMPLAINT PURSUANT TO 735 ILCS SECTION 2-619.1**

1. 2010/03/16, Plaintiff/Counter-Defendant’s Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to 735 ILCS Section 2-619.1
  - a. Certification of Service, March 16, 2010 (1 pg.)
  - b. Plaintiff/Counter-Defendant’s Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to 735 ILCS Section 2-619.1 (2 pgs.)
2. 2010/03/16, Memorandum in Support of Plaintiff/Counter-Defendant’s Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to 735 ILCS Section 2-619.1
  - a. Certification of Service, March 16, 2010 (1 pg.)
  - b. Memorandum in Support of Plaintiff/Counter-Defendant’s Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to 735 ILCS Section 2-619.1 (14 pgs.)
3. 2010/04/15, Defendant/Counter-Plaintiff Response to Plaintiff/Counter-Defendant’s Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to 735 ILCS Section 2-619.1
  - a. Notice of Filing, April 15, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1109 Certification (1 pg.)
  - d. Defendant/Counter-Plaintiff Response to Plaintiff/Counter-Defendant’s Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to 735 ILCS Section 2-619.1 (8 pgs.)
  - e. List of Exhibits (1 pg.)
4. 2010/05/07, Plaintiff’s Reply in Support of its Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to ILCS Section 2-619.1
  - a. Certification of Service, May 7, 2010 (1 pg.)
  - b. Plaintiff’s Reply in Support of its Motion to Dismiss Affirmative Defenses and Counter-Complaint Pursuant to ILCS Section 2-619.1 (9 pgs.)
5. 2010/05/13 Order (1 pg.)
  - a. “Plaintiff’s Motion to Dismiss is granted.”

**GROUP EXHIBIT 11 – DEFENDANT/COUNTER-PLAINTIFF MOTION TO DISMISS COMPLAINT TO FORECLOSE MORTGAGE FOR LACK OF LEGAL STANDING**

1. 2010/03/03, Defendant/Counter-Plaintiff Motion to Dismiss Complaint to Foreclose Mortgage for Lack of Legal Standing
  - a. Notice of Motion, March 3, 2010 (1 pg.)
  - b. Proof of Service (2 pgs.)
  - c. Notice of Motion – Amended Date, March 5, 2010 (1 pg.)
  - d. Proof of Service (1 pg.)
  - e. Defendant Section 1109 Certification (1 pg.)
  - f. Defendant/Counter-Plaintiff Motion to Dismiss Complaint to Foreclose Mortgage for Lack of Legal Standing (12 pgs.)
  - g. List of Exhibits (3 pgs.)
2. 2010/04/15, Plaintiff's Response to Defendant Scheffer's Motion to Dismiss Complaint to Foreclose Mortgage for Lack of Legal Standing (10 pgs.)
  - a. Certification of Service, April 15, 2010 (1 pg.)
  - b. Plaintiff's Response to Defendant Scheffer's <sic> Motion to Dismiss Complaint to Foreclose Mortgage for Lack of Legal Standing (10 pgs.)
3. 2010/05/05, Defendant's Reply to Plaintiff's Response to Defendant Scheffer's <sic> Motion to Dismiss Complaint to Foreclose Mortgage for Lack of Legal Standing
  - a. Notice of Filing, May 5, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1109 Certification (1 pg.)
  - d. Defendant's Reply to Plaintiff's Response to Defendant Scheffer's <sic> Motion to Dismiss Complaint to Foreclose Mortgage for Lack of Legal Standing (10 pgs.)
  - e. General State re: No Waiver of Rights (2 pgs.)
  - f. List of Exhibits (9 pgs.)
4. 2010/05/13 Order (1 pg.)
  - a. "Defendant's Motion to Dismiss is denied."
  - b. **"The Court finds that Plaintiff has legal standing."**

**GROUP EXHIBIT 12 – DEFENDANT MOTION FOR SUMMARY JUDGMENT**

1. 2010/09/08, Defendant Motion for Summary Judgment
  - a. Notice of Motion, September 8, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1109 Certification (1 pg.)
  - d. Defendant Motion for Summary Judgment (15 pgs.)
  - e. Memorandum in Support of Defendant Motion for Summary Judgment (13 pgs.)
  - f. List of Exhibits (18 pgs.)

**GROUP EXHIBIT 12 – DEFENDANT MOTION FOR SUMMARY JUDGMENT (CON'T.)**

2. 2010/10/05, Motion to Strike Defendant's Motion for Summary Judgment
  - a. Notice of Filing/Certification of Service, October 5, 2010 (2 pgs.)
  - b. Motion to Strike Defendant's Motion for Summary Judgment (2 pgs.)
  - c. Exhibit A: 2010/05/13 Court Order (1 pg.)
  - d. Exhibit B: 2010/08/12 Court Order
    - 1) **“All filings by Defendant Scheffers related to affirmative defenses, counterclaims, or related defense matters must be submitted to the Court for written approval regarding whether Plaintiff must respond or whether the filings will be stricken without hearing or further briefings.”**
3. 2010/10/18, Defendant Response to Plaintiff Motion to Strike Defendant Motion for Summary Judgment
  - a. Notice of Filing, October 18, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Response to Plaintiff Motion to Strike Defendant Motion for Summary Judgment (4 pgs.)
  - e. List of Exhibits (2 pgs.)
4. 2010/10/18, Defendant Combined Response to Plaintiff Motion for Order of Default, Motion for Judgment for Foreclosure and Sale, and Motion for Summary Judgment
  - a. Notice of Filing, October 18, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Combined Response to Plaintiff Motion for Order of Default, Motion for Judgment for Foreclosure and Sale, and Motion for Summary Judgment (3 pgs.)
  - e. List of Exhibits (1)
  - f. Exhibit 1
    - 1) Notice of Motion (1 pg.)
    - 2) Motion for Order of Default (1 pg.)
    - 3) Motion for Judgment for Foreclosure and Sale (1 pg.)
    - 4) ~~Motion for Summary Judgment (1 pg.)~~

**NOTE: This Motion for Summary Judgment is different than the one served upon the Defendant on April 5, 2011, the day after the Plaintiff Motion for Summary Judgment had been granted on April 4, 2011, when it had already been denied on March 22, 2011.**
5. 2010/10/19, [Plaintiff] Reply in Support of Motion for Summary Judgment
  - a. Notice of Filing/Certificate of Service October 20, 2010 (2 pgs.)
  - b. [Plaintiff] Reply in Support of Motion for Summary Judgment (4 pgs.)

**NOTE: No Plaintiff Motion for Summary Judgment was filed with the Court**

**GROUP EXHIBIT 12 – DEFENDANT MOTION FOR SUMMARY JUDGMENT (CON'T.)**

6. 2010/10/23, Defendant Reply in Support of Defendant Motion for Summary Judgment Pursuant to 735 ILCS 3/2-1005 – Corrected
  - a. Notice of Filing, October 23, 2010 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Reply in Support of Defendant Motion for Summary Judgment Pursuant to 735 ILCS 3/2-1005 – Corrected (6 pgs.)
  - e. List of Exhibits (2 pgs.)
7. 2011/03/22 Memorandum and Order received March 26, 2011 for April 4, 2011 hearing
  - a. Cover letter (1 pg.)
  - b. Memorandum and Order (12 pgs.)
  - c. 2011/03/28 Clerk entry relative to Memorandum and Order of March 22, 2011
    - 1) Plaintiff's motion to strike the motion for summary judgment of Defendant is denied
    - 2) Defendant's motion to strike the motion for summary judgment of Plaintiff is denied
    - 3) Defendant's motion for sanctions is denied
    - 4) Defendant's motion for summary judgment is denied
    - 5) Plaintiff's motion for summary judgment is denied
    - 6) **Matter is set for status on April 4, 2011 at 9:00 AM in Room 401**
8. 2011/04/04 Order (1 pg.)
  - a. "Plaintiff's Motion for Summary Judgment is granted."
  - b. **"Plaintiff is to send copy of its Motion for Summary Judgment to Defendant."**

**NOTE: The Court suddenly granted Plaintiff Motion for Summary Judgment at a status call to set a trial date on April 4, 2011, when the unrecorded Plaintiff's Motion for Summary Judgment had just been denied on March 22, 2011**
9. 2011/04/05 Copy of Pierce & Associates letter to Judge Rossi (1 pg.)
10. 2011/04/05 Motion for Summary Judgment (1 pg.)
  - a. **Granted the day before, when denied on March 22, 2011**
  - b. **Never filed nor previously served upon the Defendant**

**GROUP EXHIBIT 13 – DEFENDANT MOTION TO VACATE JUDGMENT FOR FORECLOSURE AND SALE**

1. 2011/05/07, Defendant Motion to Vacate Judgment for Foreclosure and Sale
  - a. Notice of Motion, May 7, 2011 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Motion to Vacate Judgment for Foreclosure and Sale (32 pgs.)
  - e. List of Exhibits (35 pgs.)
2. 2011/06/22, Order (1 pg.)
  - a. "Defendant's motion to vacate judgment of foreclosure and sale is denied."

**GROUP EXHIBIT 14 – DEFENDANT MOTION TO COMPEL PRODUCTION 2**

1. 2011/02/22, Defendant's Second Request for Production
  - a. Proof of Service (2 pgs.)
  - b. Defendant's Second Request for Production (3 pgs.)
2. **Plaintiff's Response to Defendant's Second Request for Production - NONE**
3. 2011/05/09, Defendant Motion to Compel Production 2
  - a. Notice of Motion, May 9, 2011 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Defendant Motion to Compel Production 2 (4 pgs.)
  - e. List of Exhibits (3 pgs.)
4. 2011/06/22, Order (1 pg.)
  - a. **"Defendant's motion to Compel Production 2 is denied."**

**GROUP EXHIBIT 15 – MOTION FOR TEMPORARY RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION**

1. 2011/06/17, Motion for Temporary Restraining Order and/or Preliminary Injunction
  - a. Notice of Motion, June 17, 2011 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. Motion for Temporary Restraining Order and/or Preliminary Injunction (8 pgs.)
  - e. List of Exhibits (2 pgs.)
2. 2011/06/22, Order (1 pg.)
  - a. **"Defendant's motion for temporary restraining order and preliminary injunction is denied."**

**GROUP EXHIBIT 16 – NOTICE OF APPEAL**

1. 2011/07/01, Notice of Appeal
  - a. Notice of Appeal, July 1, 2011 (1 pg.)
  - b. Proof of Service (1 pg.)
  - c. Defendant Section 1 109 Certification (1 pg.)
  - d. List of Exhibits (2 pgs.)

**GROUP EXHIBIT 17 – SHERIFF'S REPORT OF SALE AND DISTRIBUTION/ CERTIFICATE OF SALE**

1. **2011/07/20, Sheriff's Report of Sale and Distribution (2 pgs.)**
2. **2011/07/28, Sheriff's Certificate of Sale (1 pg.)**
3. 2012/02/28, E-mail to Thomas P. James, Consumer Counsel, Consumer Fraud Bureau, Illinois Attorney General re: **SCHEFFERS/UPDATE 1 OF 3 DUNN MARTIN-SCHEFFERS /PIERCE/DYKEMA CONSUMER FRAUD (3 pgs.)**